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February 24, 2006

ASST. U.S. ATTORNEY WILLIAM WELCH
U.S. FEDERAL COURTHOUSE
1550 Main Street
Springfield, MA 01103

RE: U.S. v. Innarelli et al
Docket No. - 04-30046-MAP

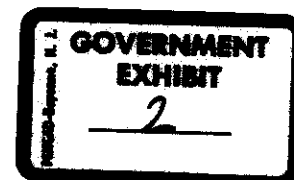
Dear Attorney Welch:

As you know, this office represents Mark McCarthy in connection with the above-referenced matter.

In light of the fast approaching trial date, as well as your March 24th deadline to enter a plea agreement, please accept this letter as a formal request for copies of the loan files and related documents for the following properties forthwith:

- *84 Andrew St., Springfield, MA
- *12-14 James St., Springfield, MA
- *100 Pearl Street, Springfield, MA
- *6-8 Hampden St., Springfield, MA
- *15-17 Eaton St., Springfield, MA
- *52 Clarendon St., Springfield, MA
- *70-72 Maynard St., Springfield, MA
- *740 Allen St., Springfield, MA
- *1349-1351 Worcester St., Springfield, MA
- *31 Mazarin St., Springfield, MA
- *71 Bernard St., Springfield, MA
- *825 Chicopee St., Chicopee, MA

Please be advised that despite numerous calls to The Maverick Group, I have yet to receive the copies requested in my letter to you dated December 13, 2005.



Thank you for your anticipated cooperation.

Very truly yours,

SANTANIELLO & SANTANIELLO, LLC

A handwritten signature in cursive script, reading "Robert T. Santaniello". The signature is written in dark ink and is positioned above the printed name.

Robert T. Santaniello

cc: The Maverick Group

RTS/tr